JUL 31 2001

CERTIFIED MAIL–
RETURN RECEIPT REQUESTED–

Mr. Gordon S. Kuntz, Ph.D.
Senior Environmental Scientist
The Sherwin-Williams Company
101 Prospect Avenue, N.W.
Cleveland, Ohio 44115-1075

Re: Outstanding Issues from the May 16, 2001 Meeting on the November 1999 Draft Work Plan and Field Sampling and Analysis Plan for RI/FS Activities; Gibbsboro, NJ

Dear Mr. Kuntz:

A meeting was held between the U.S. Environmental Protection Agency (EPA), the Sherwin-Williams Company (SWC), and its contractor, Roy F. Weston (Weston), on May 16, 2001. There were four outstanding issues which resulted from the meeting: (1) soil sample grid spacing for all of the sites; (2) the percentage of samples to be analyzed for TCL, TAL and TCLP parameters; (3) the Railroad Track Area soil sampling grid; and (4) the sampling of a portion of the U.S. Avenue Burn Site east of Haney Run Brook and White Sand Branch. EPA's final decisions on the above-described issues are noted below and must be incorporated into the revised RI/FS Work Plan:

(1) Soil Sample Grid Spacing for All of the Sites:

We requested EPA's National Exposure Research Laboratory in Las Vegas, NV (EPA-LV) to review the geostatistical analysis that SWC and Weston proposed during the May 16, 2001 meeting. We have concluded, with the assistance of EPA-LV, that your proposed 200 ft. sampling grid dimension is not applicable to the Sites since the Kriging approach only evaluated lead contamination without consideration to other potential contaminants of concern. If SWC

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Symbol	NJP/SCT	NJP/SCT	NJRB					
Surname	E. KEVENEY	R.Evangelista	C.Petersen					
Date	7/31/01	7/31/01	7/31/01					

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wishes to use the Kriging approach for determining sampling grid dimensions for the RI/FS, SWC must perform the geostatistical analysis for each potential contaminant of concern for each of the Sites and the shortest of the generated grid spacings should be proposed as the grid spacing for the RI/FS sampling at each of the Sites. In addition, since activities such as backfilling, landscaping, grading, etc. may have covered over/redistributed areas of contamination, the geostatistical analysis must also be conducted for each potential contaminant of concern using subsurface data for each of the Sites, in addition to performing the analysis separately for surface data, for each potential contaminant of concern, to be confident that the shortest sampling grid spacing will be proposed for the RI/FS sampling activities. Further, regardless of the sampling grid spacing recommended by the geostatistical analysis, the sampling grid spacing must be adjusted to account for the variances in transportation and depositional characteristics among the contaminants and the topography of the Sites. All suspect areas of contamination which may fall outside the proposed sampling grid (such as depositional areas within Hilliards Creek) must also be specifically proposed for sampling. If SWC does not have enough existing data for the other potential contaminants of concern for adequate variogram modeling, then the soil sampling grid spacing shall remain the same as noted in EPA's April 19, 2001 correspondence to SWC on its November 1999 RI/FS Work Plan with the exception of the modifications noted below under items numbered (3) and (4).

(2) The Percentage of Samples to be Analyzed for TCL, TAL and TCLP Parameters:

The analytical parameters to be sampled for will be modified as follows:

(a) Site characterization activities on residential properties will include 100% Target Compound List/Target Analyte List (TCL/TAL) analyses for all proposed samples.

(b) For all other properties, site characterization activities for soil and sediment media will include 100% TCL/TAL analyses. Only 50% of these samples taken at the immediate surface must be analyzed for volatile organic compounds. These samples must be evenly distributed over the entire area in order to provide a data set which best represents the entire area.

(c) For all other properties, site characterization activities for surface water and groundwater media will include 100% TCL/TAL analyses.

(d) Toxicity Characteristic Leaching Procedure (TCLP) sampling will remain at 20%.

(3) The Railroad Track Soil Sampling Grid:

The sampling scheme noted under Comment # 180(e) of EPA's April 19, 2001 correspondence to SWC on its November 1999 RI/FS Work Plan will be modified as follows for the sampling below the areas excavated during the 1997 removal action along the east and west sides of the railroad track: At a minimum, for this first phase of the RI/FS, soil sampling points shall be located at a minimum frequency of one sample point for every 30 feet (this is approximately one sample every 900 square feet as determined by using the area measured within the surficial perimeter of the area excavated). Soil samples shall be collected at three intervals at each

location specified above: one below the point of excavation and backfill; one 6 inches above the water table; and, one in-between the point of excavation and the water table.

Additionally, the systematic sampling grid noted under Comment # 180(f) of EPA's April 19, 2001 correspondence to SWC on its November 1999 RI/FS Work Plan will be modified to extend outwards only 90 feet as opposed to150 feet in a horizontal direction from the outer edges of the surficial perimeter of the areas excavated during the removal action. The sampling grid nodes shall remain to be spaced 30 feet apart.

(4) The Sampling of a Portion of the U.S. Avenue Burn Site East of Haney Run Brook and White Sand Branch:

The sampling scheme noted under Comment # 163(c) of EPA's April 19, 2001 correspondence to SWC on its November 1999 RI/FS Work Plan will be modified as follows for the area east of White Sand Branch and Haney Run Brook at the U.S. Avenue Burn Site: a systematic sampling grid shall extend from Haney Run Brook and shall extend outwards 150 feet in a east/northeast/southeast direction for this first phase of the soil sampling. The other segment of the systematic sampling grid shall extend from White Sand Branch extending in a southerly direction slightly past the convergence with Haney Run Brook (approximately 30 feet past sampling location 122 specified in Figure # 2-1, Sampling Location Map, U.S. Avenue Burn Site Investigation, March 1997, attached under the November 199 Draft RI/FS Work Plan) and shall extend outwards in a east/northeast/southeast direction 150 feet past the current fenceline (i.e., in the direction of Block 22) for this first phase of the soil sampling. Soil sampling shall be conducted at each sampling grid node. The sampling grid nodes shall be spaced 50 feet apart. In instances, where a sampling grid node location shall actually extend into another water body or onto a building structure, that sampling grid location shall be located within 2 feet from the bank of the water body or the building structure. A revised figure #10 (NOT TO SCALE) dated July 2001 has been enclosed to clarify the aforementioned revised sampling scheme.

The rationale for preserving a certain portion of the original sampling scheme noted in our April 19, 2001 correspondence to SWC east of the water bodies at the U.S. Avenue Burn Site is as follows:

(i) the area east of White Sand Branch: excessive concentrations of lead contamination have already been detected at the surface and the subsurface east of White Sand Branch at the U.S. Avenue Burn Site as noted below:

Sample #	Lead Concentration (ppm)
44	1000 (surface)
45	1740 (surface), 431 (2' bgs)
47	1680 (surface), 7300 (2' bgs)
112	3670 (surface), 2990 (2'bgs)

47	1680 (surface), 7300 (2' bgs)
112	3670 (surface), 2990 (2'bgs)
122	420 (surface)
536	1460 (surface), 1360 (2'bgs)
B22-1	1190 (surface) 1250 (2'bgs)
B22-2	1250 (surface)

(ii) the area east of Haney Run Brook: excessive concentrations of lead contamination have already been detected at the surface east of Haney Run Brook at the U.S. Avenue Burn Site as noted below:

Sample #	**Lead Concentration (ppm)**
14	433 (surface)
50	561 (surface)
110	808 (surface)

Therefore, it is clear that the full nature and extent of horizontal and vertical contamination needs to be defined east of Haney Run Brook and White Sand Branch at the U.S. Avenue Burn Site.

As noted to you in a June 7, 2001 correspondence, EPA has provided SWC an extension beyond the June 15, 2001 deadline for the submission of a revised RI/FS Work Plan. The additional extension is equivalent to the number of calendar days that were required by EPA beyond the May 16, 2001 meeting date (or the number of calendar days from May 16, 2001 to the date of this letter, July 31, 2001) to provide SWC with a final resolution on each of the outstanding issues. Accordingly, EPA will extend the deadline date for SWC's submission of a revised RI/FS Work Plan to September 3, 2001.

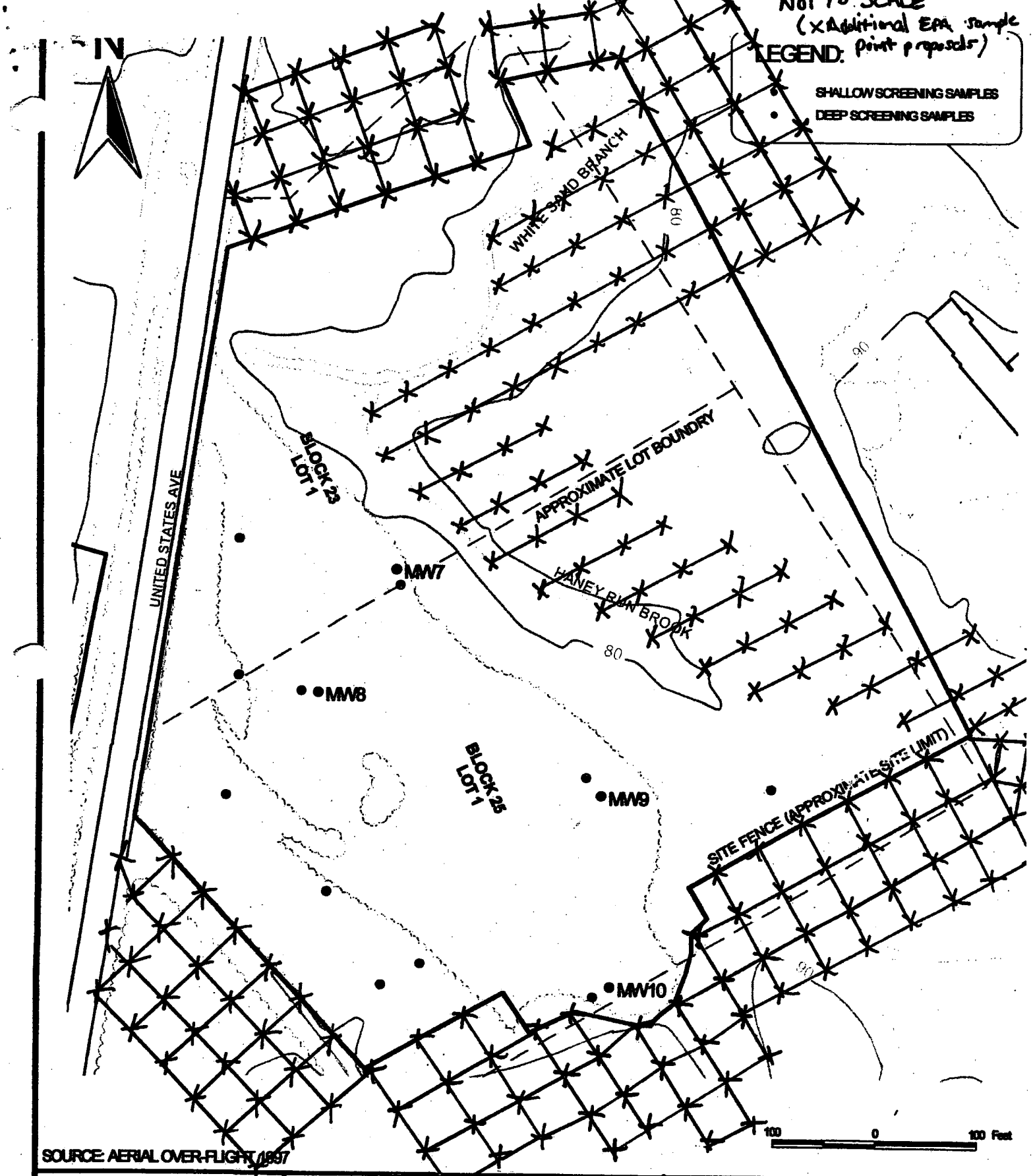
If you have any questions on this matter, please feel free to contact Mr. Emmet Keveney, of my staff, at (212) 637-3916, or if you have any legal concerns, Mr. Carl Howard at (212) 637-3216.

Sincerely yours,

Carole Petersen, Chief
New Jersey Remediation Branch

cc: Allen Danzig, Esq., SWC w/encl.
Theodore Toskos, Weston w/encl.
John Gerulis, SWC w/encl.
John Doyon, NJDEP w/encl.

bcc: Carl Howard, ORC 16th fl. w/encl.
Pat Evangelista, 2ERRD-NJRB w/encl.
Emmet Keveney, 2EERD-NJRB w/encl.



Not to SCALE
(x Additional EPA sample point proposed)

WESTON MANAGERS DESIGNERS/CONSULTANTS	RI/FS WORK PLAN	BURN SITE SAMPLING LOCATIONS
00034	GIBBSBORO, NEW JERSEY CLIENT NAME: THE SHERWIN-WILLIAMS COMPANY	DATE: JULY 2001 X 11/1999 FIGURE #: 10